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13 AT&T CORP. and AT&T INC.

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA

16 SAN FRANCISCO DIVISION

17
18 TASH HEPTING, GREGORY HICKS,
CAROLYN JEWEL and ERIK KNUTZEN
19 on Behalf of Themselves and All Others
Similarly Situated,

20 Plaintiffs,

21 vs.

22 AT&T CORP., AT&T INC. and DOES 1-20,
23 inclusive,

24 Defendants.

No. C-06-0672-VRW

**DECLARATION OF BRUCE A.
ERICSON IN SUPPORT OF
MOTION OF DEFENDANT AT&T
CORP. TO FILE DOCUMENTS
UNDER SEAL**

[Civ. L.R. 7-11, 79-5]

Courtroom: 6, 17th Floor

Judge: Hon. Vaughn R. Walker

Filed concurrently:

1. Motion to File Documents Under Seal
2. Proposed Order

1 I, **BRUCE A. ERICSON**, declare as follows:

2 1. I am an attorney licensed to practice law in the State of California and
3 admitted to practice before this Court, and am a partner of the law firm of Pillsbury
4 Winthrop Shaw Pittman LLP, counsel for movant/defendant **AT&T CORP.** (“AT&T”) and
5 also for specially appearing defendant **AT&T INC.**, which is not a party to this motion
6 (AT&T and AT&T Inc. are collectively referred to as the “defendants”). Except for those
7 matters stated on information and belief, which I believe to be true, I have personal
8 knowledge of the facts stated herein and, if called as a witness, I could and would
9 competently testify thereto.

10 2. The Motion of Defendant AT&T Corp. to Compel Return of Confidential
11 Documents; Supporting Memorandum (the “Confidential Motion”) and the Declaration of
12 James W. Russell in Support of Motion of Defendant AT&T Corp. to Compel Return of
13 Confidential Documents (the “Confidential Russell Declaration”) contain detailed
14 discussion of certain confidential documents (the “Confidential Documents”) of which
15 AT&T seeks return.

16 3. The Confidential Documents contain detailed non-public information about
17 critical communications infrastructure operated by AT&T.

18 4. I am informed and believe that AT&T considers the information in the
19 Confidential Documents highly confidential and proprietary, and such information has
20 value generally unknown to the public or AT&T’s competitors.

21 5. I am informed and believe that AT&T is careful to preserve the
22 confidentiality of information contained in the Confidential Documents, and public
23 disclosure of the information contained in the Confidential Documents could create great
24 risk to AT&T’s ability to provide services and carry out its business activities. Exposure to
25 the threats that would arise from disclosure of the Confidential Documents would harm
26 AT&T and its customers, which include businesses, federal, state and local government,
27 and private individuals.

